

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

FILED

2010 APR -8 P 4: 17

PUBLIC UTILITIES  
COMMISSION

In the Matter of the Application of )  
PUBLIC UTILITIES COMMISSION ) DOCKET NO. 2008-0273  
Instituting a Proceeding to Investigate the )  
Implementation of Feed-in Tariffs. )  
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**THE SOLAR ALLIANCE'S AND HAWAI'I SOLAR ENERGY ASSOCIATION'S  
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC,  
HAWAII ELECTRIC LIGHT COMPANY, INC., AND MAUI ELECTRIC  
COMPANY, LTD. ON PROPOSED DRAFT FOR TIER 3 FEED-IN TARIFF**

**AND**

**CERTIFICATE OF SERVICE**

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ASSOCIATION

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

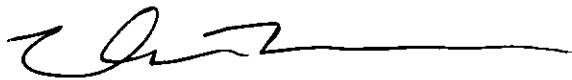
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INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.,  
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COMPANY, LTD. ON PROPOSED DRAFT TIER 3 FEED-IN TARIFF**

The Solar Alliance and Hawai'i Solar Energy Association hereby respectfully submit the following Information Requests to the Hawaiian Electric Company, Inc., Hawaii Electric Light Company, Inc., and Maui Electric Company, Ltd. (collectively, the "HECO Companies") on their proposed draft Tier 3 Feed-in Tariff.

Respectfully submitted,

DATED: Honolulu, Hawaii, April 8, 2010.



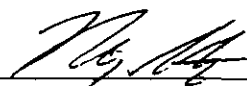
ISAAC MORIWAKE

Attorney for:

HAWAI'I SOLAR ENERGY ASSOCIATION

Respectfully submitted.

DATED: Honolulu, Hawaii,

  
\_\_\_\_\_  
RILEY SAITO

for The Solar Alliance

**DOCKET NO. 2008-0273**

**THE SOLAR ALLIANCE'S AND HAWAI'I SOLAR ENERGY ASSOCIATION'S  
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC,  
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**INSTRUCTIONS:**

In order to expedite and facilitate The Solar Alliance and Hawai'i Solar Energy Association's ("SA/HSEA") review and analysis in the above matter, the following is requested:

1. For each response, the HECO Companies should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Should the HECO Companies claim that any information is not discoverable for any reason:
  - a. State all claimed privileges and objections to disclosure;
  - b. State all facts and reasons supporting each claimed privilege and objection;
  - c. State under what conditions the HECO Companies is willing to permit disclosure to SA/HSEA (e.g. protective agreement, review at business offices, etc.); and
  - d. If the HECO Companies claim that a written document or electronic file is not discoverable, besides complying with subparagraphs 2a-c, identify each document or electronic file, or portions thereof, that the HECO Companies claim are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

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<sup>1</sup> No Information Requests have been submitted on curtailment because the parties are awaiting a proposal on this issue from the HECO Companies. Thus, SA/HSEA reserve their right to file additional IRs once they receive a proposal from the HECO Companies.

SA/HSEA-T3-IR-1 Ref.: The HECO Companies have stated that “Land costs are from a variety of sources including HECO’s in-house team, industry input, and real estate broker quotes in Hawaii.”

Did these sources base the land costs on Hawai‘i PV projects? If not, why not. If yes, please identify the Hawai‘i PV projects.

SA/HSEA-T3-IR-2

In calculating the proposed rate for PV for Tier 3, why did the HECO Companies and their consultants use different capacity factors for different size PV projects? Please explain in detail and provide all supporting materials for using the different capacity factors.

SA/HSEA-T3-IR-3

In calculating the proposed rate for PV for Tier 3, please explain in detail and provide all supporting materials on how the HECO Companies and their consultants developed their debt equity ratios for PV. Is the proposed debt equity ratio based on any U.S. mainland PV Projects? If not, why not. If yes, please identify the U.S. mainland PV projects.

Is the proposed debt equity ratio based Hawai‘i PV projects? If not, why not. If yes, please identify the Hawai‘i PV projects.

SA/HSEA-T3-IR-4 Ref: The HECO Companies and their consultants confirmed during the March 10, 2010 Tier 3 Workshop that their permitting costs for PV for Tier 3 do not include legal fees and costs.

- a. What would the permitting costs for PV for Tier 3 be if legal fees and costs were included?
- b. Would this change the HECO Companies’ proposed rate for PV for Tier 3? If yes, by how much?

SA/HSEA-T3-IR-5 Ref.: The HECO Companies and their consultants have stated that the estimated interconnection costs “are assumed to be the same across the technologies” and “came from HECO’s internal interconnection team, as well as equipment manufacturer quotes for transformers.”

Did HECO’s internal interconnection team and the equipment manufacturer quotes derive their costs based on Hawai‘i PV projects? If not, why not. If yes, please identify the projects.

SA/HSEA-T3-IR-6 Ref.: The HECO Companies and their consultants have stated that “the \$25,000 [interconnection cost] for the 1MW given was based on a couple of HELCO projects which required IRSs.”

Please identify these projects.

SA/HSEA-T3-IR-7 Ref.: During the March 10, 2010 Tier 3 Workshop, the HECO Companies agreed to provide the cost of all IRSs that they have done to date.

Please provide that information or provide a date by which the parties will receive the information.

SA/HSEA-T3-IR-8

- a. Please explain in detail and provide all supporting materials as to how the HECO Companies and their consultants derived the estimated costs for modules, inverters, and balance of systems for PV projects in Hawai‘i.
- b. Are these estimated costs based on Hawai‘i PV projects? If not, why not. If yes, please identify the projects?

SA/HSEA-T3-IR-9 Ref.: Proposed Tier 3 Tariff, section L.3.

- a. Please explain the need for an “Operating Period Security” in the Tariff.
- b. Please identify any language in the Commission’s September 25, 2009 Decision and Order which supports the requirement of an “Operating Period Security” in the Tariff.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this date, a copy of the foregoing document was duly served by first-class postage prepaid mail and electronic mail to the following parties addressed as follows:

Dean Nishina Executive Director Dept. Of Commerce And Consumer Affairs Division Of Consumer Advocacy P. O. Box 541 Honolulu, HI 96809	2 copies via U.S. Mail Dean.K.Nishina@dcca.hawaii.gov
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The undersigned hereby certifies that, on this date, a copy of the foregoing document was duly served by electronic mail to the following parties addressed as follows:

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DATED: Honolulu, Hawai'i, April 8, 2010.



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